## A COMPLAINT UNDER THE CIVIL RIGHTS ACT, 42 USC \$ 1983 UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF LOUISIANA

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ERNEST BILLIZONE SR.	*	CLASS
GARY SMITH		IVIL ACTION
RODNEY SMOTHERS	* No	•
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DONALD WILSON; ET.AL.	- **	
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ALAN J. REINECKE	*	1AGISTRATE:
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BRYAND LEWIS		
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SHEILA CRADEUR		
DENAE VAUGHN		
JEFF CLARK	*	
JAMESA LEGER		
ST, MARTIN DEPORTES WORK RELEA	& FACILITY	
JAMES M. LEBLANC	The state of the s	
FRANK SEAWARD		
	7 Page 2017 14 Pag	
ALL PLAINTIEFS HE	EIN THIS PRODE	SOING CAUSE OF ACTION
REQUESTS THAT THEY NOT B		
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PREVIOUS LAWSUITS
I. HAVE YOU FILED ANY LAWSUIT OR APPEAL IN ANY  FEDERAL DISTRICT COURT OR APPEALS COURT WHICH HAS  BEEN DISMISSED? YES NO IF YES, STATE THE  COURTS WHICH DISMISSED THE CASE, CIVIL ACTION NUMBERS AND REASON  FOR DISMISSAL (E.G. FRIVOLITY, MALICE, FAILURE TO STATE CLAIM,  IMMUNITY FROM RELIEF SOUGHT, ETC.)
T. NAME OF INSTITUTION AND ADDRESS OF CURRENT PLACE OF  CONFINEMENT: ST. MARTIN DEPORTES WORK RELEASE, 1101  CANVASBACK ST., LAKE CHARLES, LA. 70615
A. 15 THERE A PRISON GRIEVANCE PROCEDURE IN THIS INSTITUTION? YES NO
B. DID YOU FILE AN ADMINISTRATIVE GAVEVANCE BASED  UPON THE SAME FACTS WHICH FORM THE BASIS OF THIS LAWSUIT?  YES NO  WHAT ARE THE ADMINISTRATIVE REMEDY PROCEDURE NUMBER?  NONE AS DE YET
C. IF YOU DID NOT FILE A GRIEVANCE, EXPLAIN WHY?
D. IF YOU FILED AN ADMINISTRATIVE GRIEVANCE, ANSWER THE FOLLOWING QUESTIONS. WHAT SPECIFIC STEPS DID YOU TAKE AND WHAT WAS THE RESULT? MY GRIEVANCES ARE BEING SCREENED AND NOT RETURNED TO INMATES UNLESS IT
DOESN'T CONCERN THIS FACILITY. IF IT IS FAVORABLE  TO THE PUMATE IT IS DESTROYED BEFORE WE RECEIVE  LT.
STATEMENT OF CLAIM

THIS IS A CIVIL RIGHTS ACTION FILED BY ERNEST

BILLIZONE SR., AND ALL OTHERS MENTIONED HEREIN AS PLAINTIFF'S

WHOM ARE SIMILARLY SITUATED AND ARE STATE PRISONERS

FOR DAMAGES, DECLARATORY AND INJUNCTIVE RELIEF UNDER 42 U.S.C. §

1983, ALLEGING ABUSE OF AUTHORITY; MALFERSANCE OF OFFICE; DENIAL OF

ACCESS TO COURTS; DUE PROCESS OF LAW; ILLEGAL MAIL CENSORSHIP; RACIAL

DISCRIMINATION; THEFT BY FRAUD, EMBEZZIEMENT, DENIED RIGHT TO TELEPHONE

ACCESS TO ATTORNEYS, INVASION OF PRIVACY AND ILLEGAL AND UNAUTHORIZED

CAMERA RECORDING OF STRIP SEARCH AND URINALYSIS; ILLEGAL MAIL TAMPERING

AND OFFING OF LEGAL MAIL NOT IN THE PRESENCE OF IMMATE; PROPERTY OBSTRUCTION;

ILLEGAL IMPOSITION OF FEES, MENTAL ANGUISH, NO MEDICALLY TRAINED STAFF

OR MEDICAL SERVICES PROVIDED ON SITE, SUBSTANDARD LIVING CONDITIONS,

ALSO REQUESTING PUNITIVE DAMAGES.

1.

THIS HONORABLE COURT HAS JURISDICTION OVER THE PLAINTIFF'S

CLAIMS OF FEDERAL VIOLATIONS OF CONSTITUTIONAL RIGHTS UNDER 42 U.S.C.

\$\\^2\) 1331 (a) AND 1343.

 $\mathcal{A}$ 

THIS HONORABLE COURT ALSO HAS SUPPLEMENTAL TURISDICTION OVER

THE PLAINTIFF'S STATE LAW TORT CLAIMS UNDER 28 U.S.C. \$ 1367.

PLAINTIFF AVERS AND SUBMITS, THAT EACH DEFENDANT IS BEING SUED INDIVIDUALLY AND IN HIS OR HER OFFICIAL CAPACITY, AT ALL TIMES MENTIONED IN THIS COMPLAINT EACH DEFENDANT ACTED UNDER THE COLOR OF STATE LAW.

## IV.

## FACTS

HERE AT EINC, ST. MARTIN DEPORRES WORK RELEASE FACILITY,

I AM BEING DENIED ACCESS TO COURTS, DENIED THE RIGHT TO POSSESS MY

LEGAL BOOKS AND MATERIALS NEEDED TO LITIGATE MY CASE PROPERLY, ALSO,

ILLEGALLY STRIP SEARCHING AND GIVING A URINALYSIS WHILE FACING A

CAMERA, DENIED LEGAL COPIES OF MOTIONS TO SEND INTO COURT, I WAS

FORCED TO WASH PRIVATE VEHICLES WITHOUT BEING PAID, PRIVILEGED

LEGAL MAIL WAS OPENED OUTSIDE OF MY PRESENCE, I WAS FORCED TO

WORK AT MY JOB AT TEMPERATURES OF 37° WITH LOWER WIND CHILL

FACTORS WITHOUT A JACKET, BOOTS OR PROPER CLOTHING IN EXCESS OF

21/2 WEEKS, AND AS OF JANUARY 17, 2010 I STILL DON'T HAVE A

JACKET TO WEAR TO PROTECT ME FROM THE ELEMENTS, AND I AM MADE TO WEAR PRISON GARBS TO AN OUTSIDE FREEWORLD JOB, FINALLY I WAS THREATENED BY CINC'S HEAD OF SECURITY WITH THREATS OF RETALIATION IF I PURSUE THESE MATTERS ANY FURTHER, MY PROPERTY WAS destroyed by cutting off the 4000 of my sweatshirt, yet I am FORCED TO WORK IN EXTREMELY COLD WEATHER WITH NO HEAD PROTECTION, OR PROPER CLOTHING, AN ILLEGAL INCLOENTAL FEE IS TAKEN FROM IMMATES AFTER THE LEGAL RATE OF 50% HAS ALREADY BEEN TAKEN FROM OUR WAGES, WE ARE NOT FED DECENT PORTIONS OF FOOD AND WE ARE DENIED THE RIGHT TO EAT IF YOU ARE TWO MINUTES LATE AND SOMETIMES FIVE MINUTES EARLY. MY LEGAL EFFECTS IS BEING HELD IN EXCESS OF 30 DAYS AND NOT BEING SENT HOME AS I REQUESTED, FACILITY IS BEING RAN BY ALAN J. REINECKE, WHO HAS BEEN FEDERALLY INDICTED FOR EMBISIZLEMENT AND HASN'T STOPPED YET. THERE IS NO LAW LIBRIAY AT THIS FACILITY AND THE DIRECTOR MR. REINECKE INFORMED ME THEY WILL NOT CHANGE THAT FACT. ALSO, MR. GARY SMITH, A PLAINTIFF IN THIS CAUSE OF ACTION HAS

ALSO, MR. GARY SMITH, A PLAINTIFF IN THIS CAUSE OF ACTION HAS

COMPLAINTS OF ILLEGAL INCIDENTAL FEES BEING TAKEN FROM HIM FROM

THE DATES OF AUGUST 17, 2009 UNTIL THE PRESENT, ALSO BEING

ILLEGALLY STRIP SEARCHED AND GIVEN A URINALYSIS BY MONITOR JEFF

CLARK ON 11-15-09, AND ILLEGAL MAIL TAMPERING OF (ARP-HDQ
2009-1754) 2ND STEP RESPONSE OPENED ON OR ABOUT 11-16-09,

AND MAILED FROM THE 19th JUDICIAL DISTRICT COURT (ORDER), OPENED

ON ANOTHER ACCOUNT MR. RODNEY SMOTHERS, HAS COMPLAINTS OF

MONIES BEING TAKEN IN EXCESS OF 50% FROM JULY 2009 TO PRESENT

AND EXPECTED RELEASE DATE OF JANUARY 2010. ALSO VIOLATION OF ILLEGAL

STRIP SEMACH AND URINALYSIS TESTING UNDER CAMERA WITHOUT CONSENT, AND

NEVER RECEIVING A RESPONSE FROM (ARP) AND OPENING OF PRIVILEGED

CONFIDENTIAL LEGAL MAIL FROM ATTORNEY LEROY HARTLEY.

MR. CONNELL ANDERSON HAS COMPLAINTS OF UNAUTHORIZED AND

ILLEGALLY EXCESSIVE FEES BEING TAKEN, ON ONE ACCOUNT THE

PLAINTIFF RECEIVED A (AG40) SIX- HUNDRED-FORTY DOLLAR

CHECK AND ONLY RECEIVED (£9.00) NINE-DOLLARS OUT OF IT

AFTER THE 146CAL IMPOSITION OF FEES WERE TAKEN, HE ALSO HAS
COMPLAINTS OF BEING ILLEGALLY STRIP SEARCHED AND GIVEN A
BRINALYSIS IN THE VIEW OF A CAMERA WITHOUT HIS CONSENT.
MATTHEW O. STARR, HAS COMPLAINTS OF WORKING FOR OVER
(3) THREE MONTHS AND GOING HOME WITHOUT A PENNY IN 1915 ACCOUNT
BECAUSE OF THE ILLEGALLY IMPOSED FEES, AND BEING STRIP SEARCHED
IN THE PRESENCE OF A CAMERA DURING A URINALYSIS WITHOUT HIS
CONSENT, AND NOT BEING AFFORDED A BUS TICKET TO GO HOME OR
EVEN GIVEN A RIDE HOME OR TO BUS STATION, BUT FORCED OFF OF
CINC WORK RELEASE OF LAKE CHARLES' PROPERTY WITH NO
MONEY OR MEANS,
ALL PLAINTIFFS HEREIN HAVE BEEN SUBJECTED TO
UNCONSTITUTIONAL INFRINGEMENTS OF THEIR FIRST, FOURTH,
FIFTH, EIGHTH, AND FOURTEENTH AMENDMENT RIGHTS
OF THE UNITED STATES CONSTITUTION.
ST. MARTIN DEPPORRES WORK RELEASE IS ALSO DENYING
INMATES TO BE TRANSPORTED TO COURTDATES AND THEY
REFUSE TO BRING INMATES.
CINC WORK RELEASE OF LAKE CHARLES IS ALSO IN
VIOLATION OF FALSIFYING STATE DOCUMENTS, STATING THAT
THEY ARE A WORKFORCE WORK RELEASE TO ILLEGALLY
STEAL AND EMBEZZLE HUNDREDS OF THOUSANDS OF DOLLARS
A YEAR FROM INMATES BY TAKING (75%) SEVENTY-FINE
PERCENT OF THEIR WAGES, WHEN IN ACTUALITY THIS IS
A TRADITIONAL WORK RELEASE FACILITY AND ARE SUBJECT
TO LEGISLATIVE LAWS AND GUIDELINES WHICH PROHIBIT THE
DEFENDANTS FROM EXCEEDING (50%) OF INMATES WAGES
EARNED FROM WORKING, AND TAKEN FOR ROOM AND BOARD
AND OTHER ADMINISTRATIVE COST RESULTING FROM PARTICIPATION
IN A WORK RELEASE PROGRAM.
PLAINTIFFS REQUEST A CHANCE TO AMENO HIS CLAIM
AT A LATER DATE.

## RELIEF REQUESTED

WHEREFORE, PLAINTIFF REQUESTS THAT THE COURT GRANT THE FOLLOWING RELIEF:

- A . 155UE A DECLARATORY JUDGMENT STATING THAT:
  - 1. DEFENDANTS ALAN J, REINECKE, BRYAN LEWIS, HILLARY
    BROUSSARD, FRANK SEAWARD, AND SHEILA CRADEUR VIOLATED
    THE PLAINTIFF'S RIGHTS UNDER THE EIGHTH, FOURTH AND
    FOURTEENTH AMENDMENT TO THE UNITED STATES
    CONSTITUTION AND THEREBY CONSTITUTED CRUEL AND
    UNUSUAL PUNISHMENT, DENIAL OF DUE PROCESS OF LAW, DENIED
    ACCESS TO COURTS, AND ILLEGAL SETZURE OF LEGAL BOOKS
    AND DOCUMENTS,
- 2. DEFENDANTS JAMES M. LEBLANC'S FAILURE TO TAKE

  ACTION TO PROPERLY SUPERVISE DEFENDANTS ALAN J.

  REINECKE, FRANK SEAWARD, HILLARY BROUSSARD, BRYAN

  LEWIS, JEANETTE DOUGET, SHEILA CRADEUR, DENAE VAUGHN,

  JEFF CLARK, JAMESA LEGER',
- 3. DEFENDANTS ALAN J. REINECKE AND FRANK SEAWARD
  FAILED TO SUPERVISE PROPERLY, DEFENDANTS HILLARY
  BROUSSARD, BRYAN LEWIS, JEANETTE DOUCET, SHEILA
  CRADEUR, DENAE VAUGHN, JEFF CLARK, JAMESA LEGER,
- 4. DEFENDANTS ALAN J. REINECKE, FRANK SEAWARD, HILLARY
  BROUSSARD, BRYAN LEWIS, JEANETTE DOUCET, SHEILA
  CRADEUR, DENAE VAUGHN, JAMESA LEGER VIOLATED THE
  PLAINTIFF'S RIGHTS UNDER THE EIGHTH AMENDMENT, FOURTH,
  AND FOURTEENTH TO THE UNITED STATES CONSTITUTION
  TAND CONSTITUTED THEFT BY FRAUD, AND EMBEZZLEMENT
  UNDER LOUISIANA STATE AND PEDERAL LAW.
- B. 15SUE AN INJUNCTION ORDERING DEFENDANTS JAMES M.
  LEBLANC, ALAN J. REINECKE, FRANK SEAWARD, JEANETTE
  DOUCET, DENAE VAUGHN, SHELLA CRADEUR, OR THEIR

AGENTS TO: 1. IMMEDIATELY ARRANGE TO STOP TAKING INCIDENTAL FEES WHICH ARE BEING TAKEN BEYOND AND ABOVE THE (50%) FIFTY PERCENT CURRENTLY ALLOWED BY THE LAW WRITTEN AND ENACTED BY THE LEGISLATURE OF LOUISIANA OR UNTIL THE COURT DETERMINES THE LEGALITY OF THESE ACTIONS. 2. CARRY OUT THE ORDERS OF THE COURT IMMEDIATELY. C, ISSUE AN INJUNCTION TO ORDER DEFENDANTS ALAN J. REINECKE, FRANK SEAWARD, HILLARY BROUSSARD, BRYAN LEWIS, JEANETTE DOUCET, SHELLA CRADEUR, DENAE VAUGHN, JAMES M. LEBLANC, ST. MARTIN DEPORRES WORK RELEASE FACILITY, JEFF CLARK, TOS 1 : COMPORT AND COMPLY TO THE REQUESTS WRITTEN IN THE PRELIMINARY INJUNCTION WHICH ARE TO BE MADE PERMANENT, D. AWARD COMPENSATORY DAMAGES AND RESTITUTION IN THE FOLLOWING AMOUNTS: 10 \$110,000 JOINTLY AND SEVERALLY AGAINST DEFENDANTS ALAN J. REINECKE, FRANK SEAWARD, HILLARY BROUSSARD, BRYAN LEWIS, SHEILA CRADEUR, JAMES M. LEBLANC, AND JAMESA LEGER FOR THE EMOTIONAL MENTAL INJURY AND OTHER INJURIES IN OR RESULTING FROM THEIR DENIAL OF DUB PROCESS AND ACCESS TO COURTS. 2. AWARD COMPENSATORY DAMAGES JOINTLY AND SEVERALLY AGAINST DEFENDANTS, ALAN J. REINECKE, FRANK SEAWARD, HILLARY BRODSSARD, BRYAN LEWIS, JEANSTTE DOUCET, SHEILA CRADEUR, DENAE VAUGHN, JEFF CLARK, JAMESA LEGGER, JAMES M. LEBLANC, FOR ALL OF THEIR CONSTITUTIONAL VIOLATIONS AGAINST ALL PLAINTIFES HERGIN.

E. AWARD PUNITIVE DAMAGES AGAINST DEFENDANTS

ALAN J. REINECKE, FRANK SEAWARD, HILLARY BROUSSARD,					
BRYAN LEWIS, JEANETTE DOUCET, SHEILA CRADEUR, DENAE					
VAUGHN, JEFF CLARK, JAMESA LEGER, JAMES M.					
LEBLANC,					
AMOUNT TO BE DETERMINED BY THE COURTS					
AS LONG AS IT 15 DEEMED FAIR AND EQUITABLE BY					
THE PLAINTIFFS,					
DATE; FEBRUARY 1, 2010					
The state of the s					
ht Bly Dr. ET. AL.					
ERNEST BILLIZONE SR., ET. AL.					

AFFIDAVIT

I DO CERTIFY UNDER PENALTY OF PERTURY THAT I AM

A PLAINTIFF IN THE FOREGOING CAUSE OF ACTION AGAINST

CINC WORK RELEASE OF LAKE CHARLES, LOUISIANA, AND THAT

ALL STATEMENTS ARE TRUE AND CORRECT TO THE BEST OF MY

KNOWLEDGE AND UNDERSTANDING, AND AS TO STATEMENTS BASED

ON BELIEF OR HEARSAY I BELIEVE THEM TO BE TRUE.

THUS EXECUTED AND SIGNED AT CINC 1 WORK RELEASE OF LAKE CHARLES, LOUISIANA 70615, ON THIS 20 DAY OF DECEMBER , 2009.

I. ERNEST BILLIZONE SR. #88648 2. Gary Smith 3. Rodney Smothers #369791 4. Connell Anderson 5. Donald Wilson Jr. 507266 6 Eugene Edwards 7. ROLAND PLOUENA 8. Albert Bullock 9. TRAVIS MODIE 10 Drian D. Williams 11. ALFred Shannon 12. Berkeley Dixon 13. Shannon Martin 44 Jimmy Thomas 15 desome Knocksin 100297 16) JAMAR ANDERSON Indereon #167938 M. Kenalds Mathieu Yathler #527838 18. Ryan McMahan 19. Sleven Momis Lecency Walker #396034 20. Jevenywalker x 20 = #342424 DI. DERRICK S. LEDE 22. Cadring. Fuller echie L Fulli 5 40 519

a a a	#103250
3. Gregory Diefeir	Gregory Gran 452030 MATTHEW 0 STAM 452030
24. Mothew Oston	
25. Jaunes Harrison	Games Narrison 389780
26 Russell Thymes	Kussell Shymes 263657
27. OFeda Sims	Grada Sims 414308
28.Chr. Stopherheden	Christapher Joden 36/687
29. Bheggy D. Searle Ope,	Christapher Soden 36/687 Bregory D. Sepels 1275890
30. Thai Navyer	
31. BRANDON KERN	Bludadefor
32. CEDRICK Dixon	
33 Willie LASAILE	Willer Fasalle
34 Drot Lennez	Level Leng 447987
35. Anthony Vigi	Jutton Vigil 411098
36. Louis Grear	Rows Grego 268571
32 Ricky Vaugha	Ricky Variable 287987
58 Hartinez Emiliano	Martinez Emiliano 458890
39. Wille Alexander	Willy alyxander 439208
40- KERLIFICK Morris	Lenduck Morres 440284
41. Sammy CARUSO CHANGE	Sang Cara 335134
42. Joseph Robertson	Sough Potestion # 118099
43 Solomen B Chillory	Solomon B Shullon
44, Troy Mercadel	Tray Novadel #113961
45. Kaudy Walker	Randy Walker #295115 Lindsey Peters #120695
46. hirdsey Peters	Lindsey Peters #120695
The I MYELL WILLIAMS JC	Janel William p. 327444
PLAINTIPP REQUESTS THAT E	ach person whose name
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THE ADDRESS TO ALL OF THE FOR	REGOING NAMES ARE TO BE
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1101 CANVASBACK ST.	
LAKE CHARLES, LA. 706	15
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